

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

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May 16, 2018

By ECF

Honorable Vernon S. Broderick
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng, S5 15 Cr. 706 (VSB)

Dear Judge Broderick:

Defendant Ng Lap Seng respectfully requests permission for the following visitors to his apartment:

Mr. Benjamin Brafman. Mr. Brafman is 69 years old and holds New York Attorney Secure Pass. He had been Mr. Ng's attorney of record until April 13, 2016. Mr. Ng would like to discuss aspects of his case with Mr. Brafman as early as possible.

Mr. Zhuoheng Gu. Mr. Gu is 46 years old and holds China passport. He is Mr. Ng's business friend and started to know Mr. Ng since 2015. He is the owner and chairman of Sing Pao Daily, one of the major newspapers in Hong Kong. Given Mr. Gu's extensive expertise and knowledge on media and publications, Mr. Ng would like to have meetings with him to discuss about transferring the ownership of South South News to Mr. Gu to continue its operation after Mr. Ng surrenders to the facility.

Mr. Joel Sickler. Mr. Sickler is 62 years old and holds Virginia driver's license. He is an expert in BOP designation and sentencing issues. We have submitted an affidavit from him to the Court. We would like Mr. Sickler to join us on attorney visits to Mr. Ng to help us advise on designation issues.

Under the revised conditions, the defendant has sought approval from the government regarding these visitors, and the government has recently given its consent.

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Respectfully Submitted,

KIRKLAND & ELLIS LLP

By: /s Andrew M. Genser
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cc: Counsel of Record (by ECF)

SO ORDERED

Hon. Vernon S. Broderick
United States District Court
Southern District of New York